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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LISA DEE LEACH,)	Case No.: 2:24-cv-01380-AC
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 16, 2024, up to and including October 16, 2024. This is the Defendant's first request for an extension.

Defendant requests this extension in order to further consider the 2357-page administrative record in light of the four issues raised in Plaintiff's motion. Defendant's counsel has five substantive pleadings due in court between September 12, 2024, and September 18, 2024, and needs additional time to confer with the client regarding issues raised in Plaintiff's motion for summary.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3 Respectfully submitted,

4 Dated: September 16, 2024

/s/ Josephine M. Gerrard*
(*as authorized via e-mail on Sept. 11, 2024)
JOSEPHINE M. GERRARD
Attorney for Plaintiff

7 Dated: September 16, 2024


PHILLIP A. TALBERT
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11 By: /s/ Angela Thornton-Millard
ANGELA THORNTON-MILLARD
Special Assistant U.S. Attorney
13 Attorneys for Defendant

15 **ORDER**

16 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
17 extension, up to and including October 16, 2024, to respond to Plaintiff's Motion for Summary
18 Judgment.

20 DATED: September 16, 2024


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE